

1 DAVID L. YOHAI (*pro hac vice*)
ADAM C. HEMLOCK (*pro hac vice*)
2 DAVID E. YOLKUT (*pro hac vice*)
LARA E. VEBLEN TRAGER (*pro hac vice*)
3 **WEIL, GOTSHAL & MANGES LLP**
767 Fifth Avenue
4 New York, New York 10153-0119
Telephone: (212) 310-8000
5 Facsimile: (212) 310-8007
E-mail: adam.hemlock@weil.com

6 BAMBO OBARO (267683)
7 **WEIL, GOTSHAL & MANGES LLP**
201 Redwood Shores Parkway
8 Redwood Shores, California 94065-1175
Telephone: (650) 802-3000
9 Facsimile: (650) 802-3100
E-mail: bambo.obaro@weil.com

10 JEFFREY L. KESSLER (*pro hac vice*)
11 EVA W. COLE (*pro hac vice*)
MOLLY M. DONOVAN (*pro hac vice*)
12 **WINSTON & STRAWN LLP**
200 Park Avenue
13 New York, New York 10166-4193
Telephone: (212) 294-6700
14 Facsimile: (212) 294-7400
E-mail: jkessler@winston.com

15 *Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and*
16 *MT Picture Display Co., Ltd.*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 In re CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

MDL No. 1917
Master No.: 3:07-cv-05944 SC

21
22 This Document Relates to:
23 ALL ACTIONS

**DECLARATION OF ADAM C. HEMLOCK
IN SUPPORT OF CERTAIN
DEFENDANTS' MOTION FOR PARTIAL
SUMMARY JUDGMENT WITH RESPECT
TO DAPS' ALLEGED DIRECT DAMAGE
CLAIMS BASED ON PURCHASES FROM
SANYO**

Date: January 16, 2015
Time: 10:00 a.m.
Place: Courtroom 1, 17th Floor
Judge: Hon. Samuel Conti

1 I, Adam C. Hemlock, hereby declare as follows:

2 1. I am a partner at Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic
3 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.
4 (collectively, the “Panasonic Defendants”) in these actions. I am a member of the bar of the State of
5 New York and I am admitted to practice before this Court *pro hac vice*.

6 2. I submit this Declaration in support of the Certain Defendants’ Motion for Partial
7 Summary Judgment with respect to Direct Action Plaintiffs’ (“DAPs”) Alleged Direct Damage
8 Claims Based on Purchases from Sanyo Entities. I have personal knowledge of the facts stated
9 herein and, if called as a witness, I could and would competently testify thereto.

10 3. Exhibit A is a true and correct copy of excerpts of the April 15, 2014 Expert Report
11 of Alan S. Frankel on behalf of Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise
12 Services, Inc., Best Buy Stores, L.P., Bestbuy.com, LLC, and Magnolia Hi-Fi, Inc. (“Best Buy”).

13 4. Exhibit B is a true and correct copy of excerpts of the April 15, 2014 Expert Report of
14 Alan S. Frankel on behalf of Interbond Corporation of America, d/b/a BrandsMart USA
15 (“BrandsMart”).

16 5. Exhibit C is a true and correct copy of excerpts of the April 15, 2014 Expert Report of
17 Alan S. Frankel on behalf of Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating
18 Trust (“Circuit City”).

19 6. Exhibit D is a true and correct copy of excerpts of the April 15, 2014 Expert Report
20 of Alan S. Frankel on behalf of Costco Wholesale Corporation (“Costco”).

21 7. Exhibit E is a true and correct copy of excerpts of the April 15, 2014 Expert Report of
22 Alan S. Frankel on behalf of Sears, Roebuck and Co. & Kmart Corp. (“Sears/Kmart”).

23 8. Exhibit F is a true and correct copy of excerpts of Sears/Kmart’s Objections and
24 Responses to Panasonic Corp. and LGE’s First Set of Interrogatories dated December 31, 2013.

25 9. Exhibit G is a true and correct copy of excerpts from the transcript of the October 9,
26 2014 deposition of Robert L. Nowicki, who was designated as a Fed. R. Civ. P. 30(b)(6) witness for
27 Panasonic Defendants.
28

10. Exhibit H is a true and correct copy of excerpts from the transcript of the July 17, 2012 deposition of Tatsuo Tobinaga, who was designated as a Fed. R. Civ. P. 30(b)(6) witness for Panasonic Defendants.

11. Exhibit I is a true and correct copy of excerpts of Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.'s Responses and Objections to Defendants Panasonic Corporation and LGE's First Set of Interrogatories dated July 22, 2013.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 7, 2014 at New York, New York.

By: /s/ Adam C. Hemlock
ADAM C. HEMLOCK